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*Counsel for MP Holdings LLC and  
Larry D. Kelley*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**IN RE:**

**SEARS HOLDINGS CORPORATION , et al.,  
  
Debtors.**

**Chapter 11**

**Case No. 18-23538 (RDD)**

**(Jointly Administered)**

**REQUEST FOR SPECIAL NOTICE**

TO THE CLERK OF THE COURT AND ALL PARTIES IN INTEREST:

The undersigned counsel hereby enters her appearance for MP HOLDINGS LLC and LARRY D. KELLEY.

Pursuant to sections 342 and 1109(b) of the Bankruptcy Code, Rules 2002, 4001, 9007 and 9010 of the Bankruptcy Rules, but subject to the proviso in the last paragraph of this Request For Special Notice, the undersigned requests that all notices given or required to be given in this case or in any proceeding herein, and all papers served or required to be served in this case or in any proceeding herein, including, but not limited to, any proposed plan or disclosure statement, be given to and served upon the undersigned at the following address:

**Jennifer L. Pruski, Esquire  
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Sacramento, California 95865  
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In addition, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only notices and papers referred to in the Rules specified above, but also includes, without limitation save and except as set forth in the last paragraph hereof, orders on and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, copier, telegraph, telex or otherwise, which affects the Debtor or property of the Debtor or the estate.

Neither this Notice of Appearance nor any subsequent appearance, pleading, claim, or suit is intended to waive (i) Creditor's rights to have final orders in non-core matters entered only after de novo review by a district judge; (ii) Creditor's rights to trial by jury in any proceeding so triable herein, or in any case, controversy, or proceeding related hereto; (iii) Creditor's rights to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal; (iv) any other rights, claims, actions, defenses, setoffs, at law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Creditor expressly reserves; or (v) Creditor's right to service directly on it in any adversary proceeding or lawsuit in which it is named as a party.

Nothing contained herein, nor the representation of Creditor by the undersigned in these bankruptcy proceedings, shall be construed as an express or implied designation of the undersigned as the agent to receive service of process for said Creditor in any adversary proceeding or lawsuit against Creditor, and in fact, no such designation has been made. All

service on Creditor in any adversary proceeding or lawsuit against Creditor must be made on Creditor directly and not through or on the undersigned.

Dated: January 31, 2019

TRAINOR FAIRBROOK

By: /s/ Jennifer L. Pruski  
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